

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

GREGORY GORNO,	)	
	)	
Plaintiff,	)	CIVIL ACTION
	)	No. 1:13-cv-1125-SCJ
	)	
AMERICAN GLOBAL LOGISTICS, LLC;	)	
EXPEDITED FREIGHTWAYS, LLC; et al.	)	
	)	
Defendants.	)	

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**PLAINTIFF'S MOTION TO EXCEED PAGE LIMITATIONS FOR HIS BRIEF  
IN SUPPORT OF HIS MOTION TO COMPEL DISCOVERY**

Plaintiff Gregory Gorno submits this motion to exceed the page limitations for his Motion and Memorandum in Support of Plaintiff's Motion to Compel Discovery.

As grounds for this motion, plaintiff states:

1. This case involves a four count complaint against four Defendants, and a four count counter-claim, after the Court approved today Defendants voluntarily dismissal of 3 additional counterclaims. [Docket 74]
2. The 25-page limit contained in the Local Rules for the Northern District of Georgia for all briefs submitted in support of a Motion is insufficient in this instance.
3. Plaintiff is filing a Motion to Compel Discovery and thus pursuant to Rule

37.1 of the Local Rules for the Northern District of Georgia he must cite verbatim each discovery request and response to which there is a dispute, and this alone, takes up the majority of the page limit.

4. The relief requested herein is for good cause.

WHEREFORE, plaintiff respectfully requests an extension of the applicable page limitations for its motion and memorandum in support of its motion to compel discovery to thirty-five (35) pages. Plaintiff is filing its Motion and Memorandum provisionally today, pending the court's determination of this matter.

Respectfully submitted this 15<sup>th</sup> day of August, 2014.

/s/ Debra Schwartz  
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Georgia Bar No. 631035  
James E. Rollins, Jr.  
Georgia Bar No. 613825

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**PROPOSED ORDER**

Upon consideration of Plaintiff's Motion to Exceed the Page Limit for his Brief in support of his Motion to Compel, it is hereby ORDERED that the motion is GRANTED. The page limit for Plaintiff's Brief in Support of his Motion & Memorandum to Compel Discovery and Collect Reasonable Expenses under Rule 37 is hereby enlarged from twenty-five pages to thirty-seven pages.

This \_\_\_\_ day of August, 2014.

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Honorable Steve C. Jones  
United States District Judge

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**CERTIFICATE OF SERVICE**

This is to certify that I have this 15<sup>th</sup> day of August, 2014 served a copy of the attached MOTION TO EXCEED PAGE LIMITS upon Defendants by sending a copy of same via filing with the CM/ECF filing system to:

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/s/ Debra Schwartz  
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